

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

Civ. No. 25-134 MIS-JMR

\$179,371.76, 0.00016508 BTC, AND  
680,207.832603 USDC IN FUNDS FROM  
COINBASECRYPTOCURRENCY EXCHANGE  
ACCOUNT UUID Xx2576 BELONGING TO  
ALEXANDRA ROTH,

\$15,247.17 IN FUNDS FROM BANK OF  
AMERICA ACCOUNT x2237, PARTY  
IDENTIFICATION NUMBER x1529, IN THE  
NAME ALEXANDRA ROTH,

\$830,002.96 IN FUNDS FROM BANK OF  
AMERICA ACCOUNT x0927, PARTY  
IDENTIFICATION NUMBER x1529, IN THE  
NAME ALEXANDRA ROTH,  
and

\$300,640.00 IN FUNDS FROM FIDELITY  
INVESTMENTS ACCOUNT x5862, IN THE  
NAME ALEXANDRA ROTH,

*Defendants-in-rem.*

**AMENDED VERIFIED COMPLAINT FOR  
FORFEITURE *IN REM***

Plaintiff, United States of America, brings this complaint in accordance with  
Supplemental Rule G(2) of the Supplemental Rules for Certain Admiralty or Maritime Claims  
and Asset Forfeiture Actions, and alleges as follows:

**NATURE OF THE ACTION**

1. This is a civil action to forfeit and condemn to the use and benefit of the United States of America property involved in violations of 18 U.S.C. § 1030 that is subject to civil forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(C), and criminal forfeiture, pursuant to 18 U.S.C. § 982(a)(2)(B) and 18 U.S.C. § 1030(i), and involved in violations of 18 U.S.C. § 1029 that is subject to civil forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(C), and criminal forfeiture, pursuant to 18 USC § 982(a)(2)(B) and 18 U.S.C. § 1029(c)(1)(C), and involved in violations of 18 U.S.C. § 1957 that is subject to civil forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(A) and (C), and criminal forfeiture, pursuant to 18 U.S.C. § 982(a)(1), and civil forfeiture pursuant to 18 U.S.C. § 984.

**DEFENDANTS-IN-REM**

2. The *defendants-in-rem* consist of the following property (collectively, “Defendant Property”):

- a. \$179,371.76, 0.00016508 BTC, and 680,207.832603 USDC in funds from Coinbase cryptocurrency exchange account x2576 belonging to Alexandra Roth<sup>1</sup> (hereinafter, “Defendant Coinbase Property”);
- b. \$15,247.17 in funds from Bank of America account x2237 in the name Alexandra Roth and \$830,002.96 in funds from Bank of America account x0927 in the name Alexandra Roth (hereinafter, “Defendant Bank of America Property”); and
- c. \$300,640.00 in funds from Fidelity Investments account x5862 in the name

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<sup>1</sup> Alexandra Roth was mistakenly referred to as Alexandra Lane in the original complaint filed on February 7, 2025.

Alexandra Roth (hereinafter, “Defendant Fidelity Property”).<sup>2</sup>

3. Defendant Property was received by the Federal Bureau of Investigation (FBI) in the District of New Mexico pursuant to seizure warrants as follows:

- a. \$13,439.27 in funds from Bank of America x2237 on August 23, 2024;
- b. \$830,002.96 in funds from Bank of America x0927 on September 5, 2024;
- c. \$179,371.76, 0.00016508 BTC, and 680,207.832603 USDC in funds from Coinbase x2576 on August 21, 2024 (BTC and USDC) and September 5, 2024 (USD);
- d. \$300,640.00 in funds from Fidelity Investments x5862 on October 15, 2024, and
- e. \$1807.90 in funds from Bank of America x2237 on December 27, 2024.

4. Upon filing of this complaint, the United States will arrest the Defendant Property by execution of Warrants for Arrest *in Rem* in the District of New Mexico.

5. Defendant Property is now, and during the pendency of this action will be, in the jurisdiction of this Court.

#### **JURISDICTION AND VENUE**

6. The United States District Court for the District of New Mexico has subject-matter jurisdiction under 28 U.S.C. §§ 1345, 1355(a) and 1356.

7. Venue for this civil forfeiture action is proper in this district pursuant to

28 U.S.C. §§ 1355 and 1395, as acts or omissions giving rise to the forfeiture took place in this district and the property is found in this district.

### **FACTS**

#### *Evidence of unauthorized withdrawals from victim K.W.'s cryptocurrency wallet*

8. During this investigation, Special Agent Tyler Derderian of the FBI met more than once with K.W., a resident of Rio Rancho, New Mexico. K.W. told Special Agent Derderian that K.W. invests in cryptocurrency. In April 2024, K.W. advised Special Agent Derderian about attempted breaches of one of his cryptocurrency accounts with a balance at that time of approximately \$7,000,000. Then, on July 31, 2024, K.W. notified Special Agent Derderian via email of certain unauthorized withdrawals on or about July 26, 2024, from one of his cryptocurrency ledger wallets<sup>3</sup> nearing the equivalent of \$3,000,000. Special Agent Derderian has learned the address of this wallet<sup>4</sup> is bc1qu0l2dyppk3aasfs9nykaaklcdq3lqm0ednqrxxk.

9. On August 5, 2024, K.W. emailed Special Agent Derderian three cryptocurrency transaction hashes detailing the theft of 36 Bitcoin (“BTC”) from a ledger wallet he controlled:

Transaction 1:

f23eca0e4b7b98aaab8ffd61674dc6cc88f66208ee2ddcd673e22da1a8f01cfb

Transaction 2:

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<sup>3</sup> According to [crypto.com](https://crypto.com), “Cryptocurrency wallets store users’ public and private keys while providing an easy-to-use interface to manage crypto balances. They also support cryptocurrency transfers through the blockchain. Some wallets even allow users to perform certain actions with their crypto assets, such as buying and selling or interacting with decentralized applications (dapps).”

<sup>4</sup> More information about cryptocurrency wallet addresses is available at <https://greenlight.com/learning-center/investing/what-is-a-wallet-address>

bdcfd5e4661c73a89addb41ffeeb628c759bd1371a6462d82ac0fbc78cc7ab33

Transaction 3:

3dcd974b37f6708e9b18857679343be1096814609f9994d9174f71a3139b7812 (Tx 3).

10. Special Agent Derderian is experienced in cryptocurrency tracing using Chainalysis. Using commercially available tools, including, third-party software, he conducted tracing analysis on the three unauthorized transactions K.W. reported to him. This analysis showed K.W.'s ledger wallet had 50 Bitcoins prior to July 26, 2024. Within the span of one hour on July 26, 2024, there were three withdrawals from the ledger wallet totaling 36 Bitcoin, the equivalent of approximately \$2.43 million. Each of these withdrawals had the same receiving address.

<b>Tx #</b>	<b>Receiving Address</b>	<b>Bitcoin s</b>	<b>USD Value</b>
Tx 1	bc1qy4lgxy6czehvp0m82ramjr6wlcekxy2x4ehpk g	1	\$67,491.55
Tx 2	bc1qy4lgxy6czehvp0m82ramjr6wlcekxy2x4ehpk g	10	\$674,916.00
Tx 3	bc1qy4lgxy6czehvp0m82ramjr6wlcekxy2x4ehpk g	25	\$1,687,288.75

11. The funds first sent to these receiving accounts were then subsequently transferred out to several intermediary wallets before being transferred to nine different deposit addresses held at Coinbase, as listed below:

1	3PjAAy6dx78A6oLuRHjDv72c1ZrNKMqhrj
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2	3JrvBjXrachwbHM8zs33TQHQQ8n3Pp9Tm9
3	3JLacy2QS7EUL91jG4grtZfnwEvPkkeUTy
4	3KyRNUqEX7YKkVzMiqcLXBRxMsRH85kDLh
5	3GMtZsgmFE9xNPpVqoEJ9wcU6nNSXyDhGN
6	3Qhf6QpJ532ekX6h1va8euxmSDSzXMMXPN
7	3PpqSkPSrmyRrmz1NEwPbtHsLeiDrqN1GW
8	34h67hqnsxKH6LiLUgka26qiw26XwX22uh
9	3731CFeSHdCRRMkCErfNXaHyYAXa4cniys

12. On August 6, 2024, Special Agent Derderian was informed by a representative of Coinbase that all deposit addresses were associated with the same Coinbase User ID, 64cff09484cbb630fbcc2576, which linked to the account containing the Defendant Coinbase Property.

13. Later on August 6, 2024, Coinbase provided all account records associated with the account containing the Defendant Coinbase Property, including account holder information, as detailed below:

Universally Unique Identifier (“UUID”): 64cff09484cbb630fbcc2576  
Associated Email Address: alex.q.roth@gmail.com  
Name: Alexandra Roth  
Physical Address: 41 Central Ave, Montclair, NJ 07042

14. The account balance included \$178,167.14 in U.S. dollars, a separate asset of \$680,207.83 in U.S. dollar coins (USDC), and a separate asset of \$9.53 worth of BTC.<sup>5</sup>

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<sup>5</sup> According to [coinbase.com](https://coinbase.com), USDC is a type of cryptocurrency that is referred to as a fiat-backed stablecoin, meaning it is backed by reserve assets in the traditional financial system, such as cash, cash equivalents, or securities.

15. Special Agent Derderian then examined a transaction history provided by Coinbase showing BTC wallets associated with the account containing the Defendant Coinbase Property were created beginning in July 2024. This transaction history validated the tracing analysis Special Agent Derderian previously conducted and confirmed the blockchain transactions listed below were deposited into Coinbase account x2576 containing the Defendant Coinbase Property.

024	Tx. 1 07/26/2	Tx Hash: d16b85e016f36a977ab1da644e0842ed6533e42666675d973432d53a25b2ed51  Deposit Address: 3PjAAy6dx78A6oLuRHjDv72c1ZrNKMqhrj  Amount: \$955.80
024	Tx 2 07/31/2	Tx Hash: ae701245d37f065a582760f6858269c14cf5edcf387c98515c8d5b9c8c74fd0e  Deposit Address: 3JrvBjXrachwbHM8zs33TQHQQ8n3Pp9Tm9  Amount: \$201,368.88
024	Tx 3 08/01/2	Tx Hash: 7b162f3ab96294efc7ad0b784bca145643c246d30d45b3107fecc1003cf3df14  Deposit Address: 3JLacy2QS7EUL91jG4grtZfnwEvPkkeUTy  Amount: \$193,852.92
024	Tx 4 07/29/2	Tx Hash: 9fbc69a30d62a42a0df0f9e30bddb2c03ea062f469c0a55e9b51914ab5e35128  Deposit Address:

		3KyRNuqEX7YKkVzMiqcLXBRxMsRH85kDLh  Amount: \$136,505.50
024	Tx 5 07/30/2	Tx Hash: 9f24cff23d3555bc1626923d7b7369d0a5b03a8bc3f8a8e63e6c1c3ecf2bc574  Deposit Address: 3GMtZsgmFE9xNPpVqoEJ9wcU6nNSXyDhGN  Amount: \$330,577.80
024	Tx 6 07/31/2	Tx Hash: 9efed6ed1673cb4520353a29083f0a976aae4d71b305a46fbc8a64e9188381ba  Deposit Address: 3Qhf6QpJ532ekX6h1va8euxmSDSzXMMXPN  Amount: \$330,570.30
024	Tx 7 07/31/2	Tx Hash: 20b3cd709c2ff019bece33d59c84b1cdbc641c92b21ecd1e069eb49065cf7a85  Deposit Address: 3PpqSkPSrmyRrmz1NEwPbtHsLeiDrqN1GW  Amount: \$382,329.25
024	Tx 8 08/01/2	Tx Hash: 818e6870e24b1035d9b4ecbdc220ddfc1a5822fbf2b6b7e270806175bb995668  Deposit Address: 34h67hqnsxKH6LiLUgka26qiw26XwX22uh  Amount: \$129,237.58



Tx 9  07/31/2  024	Tx Hash: bd03d8730b3d2ff3802989e833061bfe3345394d41754ea72d740258f6e1e2bc Deposit Address: 3731CFeSHdCRRMkCErfNXaHyYAXa4cniys Amount: \$203,408.23
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16. Special Agent Derderian then learned through examination of Coinbase records that much of the money received by the account containing the Defendant Coinbase Property was quickly transferred to external accounts. In particular, these records showed seven withdrawals totaling \$1,162,371.62 between July 27 and July 31, 2024, to Bank of America account x2237 also in the name of Alexandra Roth.

17. Special Agent Derderian further learned through examination of Coinbase records that much of the money received by the above-described Coinbase account was quickly converted into U.S. dollars and transferred to external accounts. In particular, these records showed seven withdrawals totaling \$1,162,371.62 between July 27 and July 31, 2024, to Bank of America account x2237, also in the name of Alexandra Roth.

18. On August 26, 2024, Special Agent Derderian received records from Bank of America confirming transactions from Coinbase account x2576 to Bank of America account x2237, opened by Alexandra Roth on July 26, 2024. Statements confirmed records from Coinbase, showing that Bank of America account x2237 was funded via seven different deposits, totaling \$1,162,371.62, between July 26 and July 31, 2024. The only other deposits into Bank of America account x2237 were flight cancellation refunds totaling less than \$2,000 and banking deposits totaling less than \$30. Records showed that funds subsequently moved from Bank of America account x2237 to Bank of America account x0927, via three separate

online banking transfers of \$600,000, \$400,000, and \$90,000 on July 31, 2024. Additionally, account records showed that four transfers totaling \$301,006.83 were sent from Bank of America account x2237 to Fidelity Investment Account x5862. Records from Bank of America also showed that Bank of America account x0927 was opened by Alexandra Roth on July 31, 2024. Account history did not show any other deposits, outside of the three previously listed transfers. On July 31, 2024, and August 5, 2024, Bank of America account x0927 transferred \$250,000 and \$10,000 respectively back to Bank of America account x2237.

19. Special Agent Derderian has reviewed records from Fidelity Investments on September 9, which showed that account x5862 was opened by Alexandra Roth on July 28, 2024. Account history confirmed records from Bank of America previously detailed regarding transfers from Bank of America account 2237. Account history did not show any other deposits, outside of the four previously listed transfers.

20. On October 25, 2024, Special Agent Derderian received an email from Alvis Bergs, a Global Financial Crimes Investigator for Bank of America, regarding account x2237. Special Agent Derderian subsequently called Mr. Bergs, who noted that account x2237 had an outstanding balance of \$1,704.47 available for seizure. Mr. Bergs confirmed that account x2237 was frozen for withdrawals but could still accept deposits. Mr. Bergs confirmed that account x2237 was credited via a transfer on September 12, 2024, from Fidelity Investments.

21. On November 19, 2024, Special Agent Derderian reviewed account statements provided by Fidelity Investments, confirming the transfer from Fidelity Investments account x5862 to Bank of America account x2237 ACCOUNT 2 that Mr. Bergs had previously described.

22. Special Agent Derderian has continue to monitor the stolen funds via blockchain analysis since the theft occurred. He knows a portion of these stolen funds have remained in unhosted wallets and have not yet reached an exchange or cash out point. He has reviewed blockchain transaction records and observed transfers of stolen funds originating from K.W.'s hardware wallet as recent as January 31, 2025.

23. On August 19, 2024, Special Agent Derderian served a seizure warrant, filed under case number 24-MR-1522, to Coinbase for funds held in account x2576. On August 21, 2024, Coinbase transferred 0.00016508 BTC and 680,207.832603 USDC to government controlled wallets. At the time of the seizure, the approximate U.S. Dollar value of the two cryptocurrency assets was \$680,142.

24. Furthermore, on September 5, 2024, Special Agent Derderian received a check for the remaining contents of Coinbase account x2576, made payable to the United States Marshals Service, in the amount of \$178,167.14.

25. On August 19, 2024, Special Agent Derderian served a seizure warrant, filed under case number 24-MR-1523, to Bank of America for the funds held in account x2237. On August 23, 2024, he received a check for the contents of account x2237, made payable to the United States Marshals Service, in the amount of \$13,439.27.

26. On December 13, 2024, Special Agent Derderian served another seizure warrant, filed under case number 24-MR02301, to Bank of America for the funds held in account x2237. On December 27, 2024, he received a check for the contents of account x2237, made payable to the United States Marshals Service, in the amount of \$1,807.90.

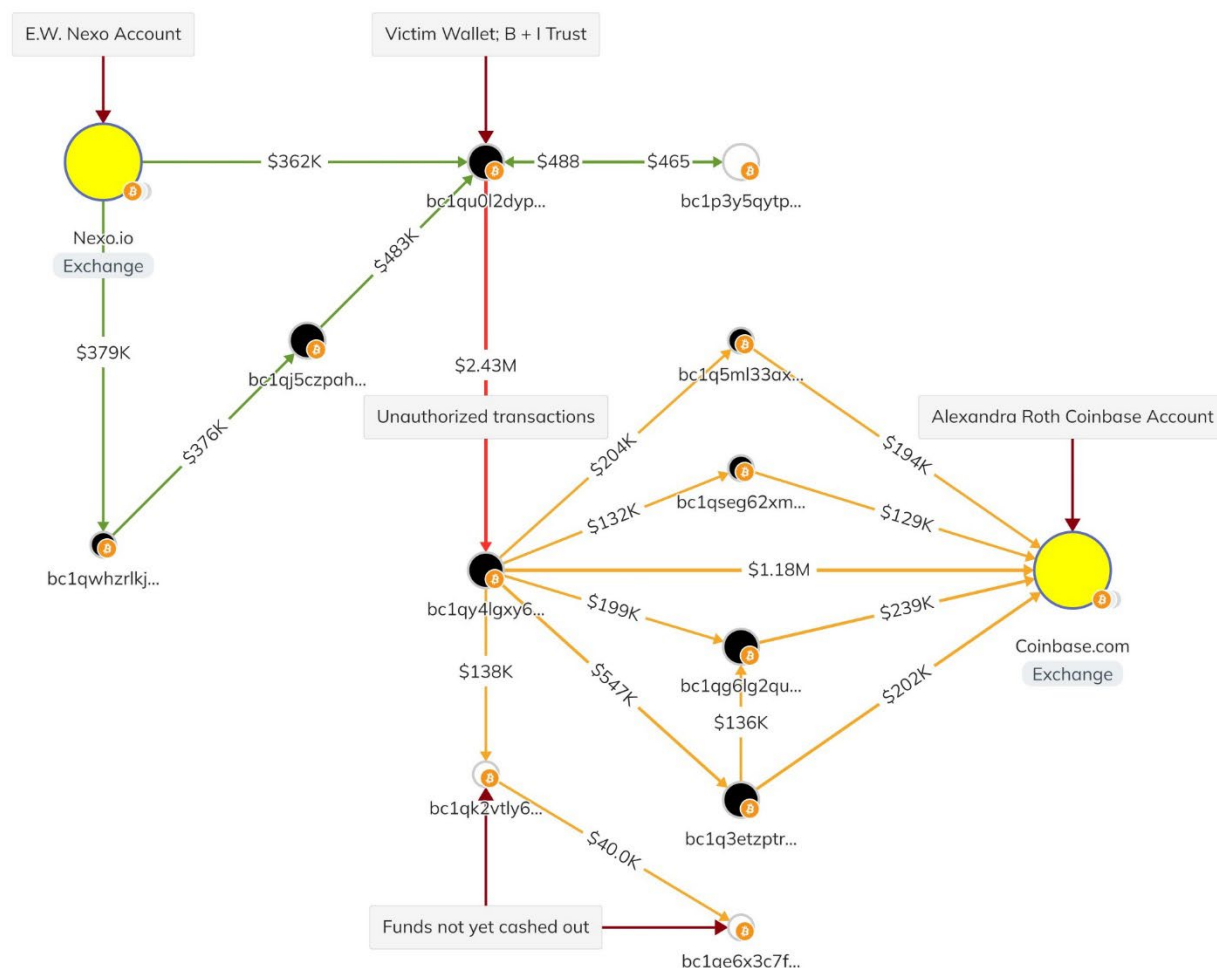
27. On August 28, 2024, Special Agent Derderian served a seizure warrant, filed under case number 24-MR-1595, to Bank of America for the funds held in account x0927. On

September 5, 2024, he received a check for the contents of account x0927, made payable to the United States Marshals Service, in the amount of \$840,002.96.

28. On September 13, 2024, Special Agent Derderian served a seizure warrant, filed under case number 24-MR-1674, to Fidelity Investments for the funds held in account x5862. On October 15, 2024, he received a check for the contents of account x5862, made payable to the United States Marshals Service, in the amount of \$300,640.00.

29. Between five seizure warrants served on the four listed accounts, approximately \$2,005,553.12 of the previously transferred \$2,429,695 has been recovered. At the time of writing, approximately \$25,000 worth of BTC remained unspent in unhosted cryptocurrency wallets, inaccessible remotely by any third party for seizure.

30. The diagram pasted below summarizes Special Agent Derderian's asset tracing in this case. K.W. initiated the transfers in green. The allegedly unauthorized transactions are noted in red. The transactions in gold follow the allegedly stolen funds until cash out.



*Verification the compromised cryptocurrency wallet belongs to victim K.W.*

31. Special Agent Derderian has reviewed an email provided by K.W.'s wife, E.W., showing transactions in January 2023 to fund K.W.'s cryptocurrency wallet. This email showed funds from an account in E.W.'s name at Nexo, a cryptocurrency exchange platform, going to K.W.'s cryptocurrency exchange wallet.<sup>6</sup> Special Agent Derderian has validated these transactions with blockchain analysis, as detailed below.

<sup>6</sup> <https://nexo.com/>

Date	Receiving Address	Bitcoins
1/3/2023	bc1qu0l2dyppk3aasfs9nykaaklcdq3lqm0ednqrzk	0.006
1/3/2023	bc1qu0l2dyppk3aasfs9nykaaklcdq3lqm0ednqrzk	28.99
1/10/2023	bc1qu0l2dyppk3aasfs9nykaaklcdq3lqm0ednqrzk	20.99

32. Special Agent Derderian is further informed by K.W. that he performed test transactions to verify that he had regained control of his cryptocurrency wallet. K.W. advised Special Agent Derderian that he then made a transferred of 0.00862024 BTC. The deposit and withdrawal transactions appear viewable on the public blockchain as follows:

24	Tx 1 08/06/20	Tx Hash: d87c360f58cf65e0059c592156e86e8a42557409cda660aa810a105d67a10a8b  Deposit Address: bc1qu0l2dyppk3aasfs9nykaaklcdq3lqm0ednqrzk  Amount: \$487.75
24	Tx 2 08/06/20	Tx Hash: b042e711113b5eb289f9905a1b49c79037872f2e38a1b7398f00a22e4f573420  Deposit Address: bc1p3y5qytp6z7qmmhlxsxgpfwafwdsz8qhv6sduf2w654evx5htf2lqqyfrwy  Amount: \$465.44

*Further investigation shows Alexandra Roth had opportunity and access to transfer money out of K.W.'s cryptocurrency wallet without his knowledge or authorization*

33. On August 9, 2024, Special Agent Derderian interviewed K.W. Detective Amando Tso from the Rio Rancho Police Department also conducted this interview. K.W.'s legal counsel participated in the interview telephonically. During the interview, Special Agent Derderian learned the history behind the creation of K.W.'s cryptocurrency wallet.

34. In particular, K.W. explained the cryptocurrency wallet in question was established and funded with 50 BTC in early 2023 as part of a trust fund intended as a tribute to K.W.'s late foster parents who adopted him at age six. K.W. had several siblings all adopted by the same foster parents. The intent of the fund was to give each adopted child a vote in how to use the fund. K.W. and E.W. decided to keep this fund secure in the afore-mentioned cold storage ledger account.<sup>7</sup>

35. K.W. explained his knowledge of how cold storage ledger devices can be accessed. K.W. stated he used an application called Ledger Live, which he logged into via his laptop. To confirm any wallet balances held on the device, K.W. would need to make a tethered cable connection between the device and his laptop, before being prompted for a device password. Once logged in on Ledger Live and into the cold storage device, K.W. could view balances of all wallets held on the device, see transaction history, and initiate new transactions. K.W. used cold storage to store the trust fund assets because he believed it was one of the safest ways to store the cryptocurrency, as the fund was not vulnerable to internet-based attacks, unless the ledger device is physically tethered to an internet-connected device.

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<sup>7</sup> Further information about cold storage ledgers is available at the following web address: <https://www.ledger.com/academy/glossary/cold-storage>.

36. K.W. confirmed he knows Alexandra Roth to be a friend of his daughter, L.W. K.W. explained that L.W. and Roth live together, rent free, in a New Jersey home that K.W. and E.W. own.

37. K.W. further informed Special Agent Derderian that Roth and L.W. visited K.W. and E.W. in New Mexico for approximately three weeks from mid-July to early August 2024. K.W. noted that L.W. and Roth stayed overnight in different hotels or vacation rentals, but often spent time at K.W.'s and E.W.'s residence. On several occasions, K.W. went to the gym while L.W. and Roth remained at his residence.

38. During the interview, Special Agent Derderian asked K.W. what he believed happened to the 36 BTC that was transferred out of his cryptocurrency wallet. K.W. stated that he thought the money was accessed by Roth. K.W. explained that he had a conversation with his daughter, L.W., on August 6. According to K.W., his daughter approached him, noting the Coinbase account that L.W. and Roth were planning to use to setup three different funds supposedly to take care of E.W. was not accessible. L.W. asked K.W. to request the funds be made accessible and to "keep things in the family". K.W. told Special Agent Derderian that he was completely unaware of any trust fund they were attempting to establish and could not comprehend why they would need to split up a fund into three different funds to take care of one person.

39. K.W. stated that he learned L.W. and Roth wanted to put K.W. into a nursing facility, citing that he was too paranoid about personal security, but wanted to ensure they had enough money for themselves before doing so. K.W. affirmed that he had not been diagnosed with any paranoia, schizophrenia, or related conditions, but was fearful for his safety and E.W.'s



safety due to the recent burglary, as well as a death threat and ongoing harassing calls from unidentified people.

40. According to K.W., he remembered being at basketball practice for several hours on July 26, which was the day the BTC was stolen. K.W. explained he normally leaves his computers in his home office unlocked.

41. K.W. told Special Agent Derderian that, as of the time of this interview, he had not been able to find one of his Ledger Nano X cold storage devices since July 26. He also stated he had not seen a paper file consisting of all notes he had shared with the FBI since April 2024 when he previously spoke to me about the attempted breaches of one of his cryptocurrency accounts.

42. K.W. stated he last spoke with L.W. on August 6 but had not received responses from her since and was unsure of her whereabouts at the time of the interview.

43. Separately, Special Agent Derderian has reviewed property records on file with the register of Essex County Register's Office in New Jersey.<sup>8</sup> These records show K.W. and E.W. purchased real property at 41 Central Avenue, Montclair, New Jersey on or about May 31, 2018. The records received from Coinbase also show this address as the residence of the account holder, who is listed as Roth.

44. Special Agent Derderian is further informed by Detective Tso that she visited the home of K.W. and E.W. in Rio Rancho on August 5, 2024, where she observed L.W. and Roth present at the location. According to Detective Tso, L.W. and Roth appeared to be very

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<sup>8</sup> <https://press.essexregister.com/prodpress/clerk/ClerkHome.aspx?op=basic>

interested in understanding exactly how much law enforcement knew about the alleged cryptocurrency theft and a prior burglary at the location on or about July 8, 2024.<sup>9</sup>

45. On August 16, 2024, the Honorable B. Paul Briones, United States Magistrate Judge, issued a warrant (24-MR-1522) to seize property subject to forfeiture for the contents of the account containing the Defendant Property.

46. On August 19, 2024, Special Agent Tyler Derderian executed this federal seizure warrant to Coinbase Exchange for funds located in the account containing the Defendant property. \$179,371.76 in U.S. Dollar funds in that account were wired to the seized asset deposit fund of the FBI.

#### **CLAIM FOR RELIEF**

47. The United States incorporates by reference the allegations in paragraphs 1 through 46 as though fully set forth herein.

48. 18 U.S.C. § 981(a)(1)(C) provides, in pertinent part, for the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1029 and/or 1030 or conspiracy to commit such offense.

49. 18 U.S.C. § 982(a)(2)(B) provides, in pertinent part, for the forfeiture of any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of a violation of 18 U.S.C. § 1029 and/or 1030 or conspiracy to commit such offense.

50. 18 U.S.C. § 1030(i) provides, in pertinent part, for the forfeiture of the interest of any person convicted of violating 18 U.S.C. § 1030 or conspiracy to commit such violation in

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<sup>9</sup> K.W. has informed Special Agent Derderian eight hard drives were stolen from the home and a laptop computer was moved from its regular location to a different area. This matter is still under investigation.

personal property that was used or intended to be used to commit or to facilitate the commission of such offense.

51. 18 U.S.C. § 981(a)(1)(A) provides, in pertinent part, for the forfeiture of any property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1957, and 18 U.S.C. § 982(a)(1) provides, in pertinent part, for the forfeiture of any property involved in or traceable to in violation of 18 U.S.C. § 1957.

52. Defendant Property constitutes the proceeds of violations of 18 U.S.C. § 1029 and 1030 or conspiracy to commit such offense and is thus subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(2)(B), and 18 U.S.C. § 1030(i).

53. Defendant Property constitutes property involved in violations of 18 U.S.C. § 1957 or conspiracy to commit such offense and is thus subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) and 18 U.S.C. § 982(a)(1).

WHEREFORE: Plaintiff seeks arrest of Defendant Property and forfeiture of same to Plaintiff, determination of the validity and priority of claims of the Claimants and any Unknown Claimants to the Defendant Property, costs, and expenses of seizure and of this proceeding, and other proper relief.

Respectfully submitted,

RYAN G. ELLISON  
United States Attorney

Electronically Filed on July 25, 2025  
SEAN J. SULLIVAN  
Assistant U.S. Attorney  
Post Office Box 607  
Albuquerque, NM 87103

**28 U.S.C. § 1746 DECLARATION**

I am a Special Agent with the Federal Bureau of Investigation who has read the contents of the Complaint for Forfeiture *In Rem* to which this Declaration is attached; and the statements contained in the complaint are true to the best of my knowledge and belief.

I declare under penalty of perjury and the laws of the United States of America that this Declaration is true and correct, except as to matters stated on information and belief, and as to those matters, I believe them to be true.

A handwritten signature in black ink, appearing to read 'Tyler Derderian', is written above a horizontal line.

Dated: 7/24/2025

Special Agent Tyler Derderian  
Federal Bureau of Investigation